

**Comments on text resulting from the Terrestrial Animal Health Code
Commission Report - December, 2003 Meeting
Submitted by the United States of America on September 13, 2004**

Guiding Principles on the Land Transport of Animals

The United States supports the World Organization for Animal Health (OIE) in its initiative to enhance its leadership role in providing global animal welfare guidance and standards. We concur with the importance of science-based standards and the significance of incremental change and commitment to continuous improvement taking into account regional, religious, and cultural issues that may impact the establishment of animal welfare guidelines.

Specific comments

We are submitting the following comments to specific text contained within the Guiding Principles for the Land Transport of Animals.

**Article 1
Responsibilities**

Bullet 2: The proposed text currently reads: Business or buying/selling agents have a joint responsibility etc... We recommend that the word “business” be deleted and replaced with “businesses”. It is more appropriate to use the plural of business in the text. The new text should read: Businesses or buying/selling agents have a joint responsibility etc...

Bullet 4: states “Transport companies, vehicle owners, and drivers are responsible for planning the journey to ensure the care of the animals”. The proposed text has three sub-bullets listed under it. We recommend the inclusion of two additional sub-bullets to clarify the responsibilities of the transport companies, vehicle owners, and drivers. One sub-bullet should read: transport companies, vehicle owners, and drivers are responsible for compensating for weather extremes such as sufficient ventilation, and the appropriate temperature and relative humidity when transporting animals. The other sub-bullet should read: transport companies, vehicle owners, and drivers are responsible for transporting animals at the appropriate density.

Bullet 5, sub-bullet 3 reads: minimizing the opportunities for disease transmission while the animals are in the facilities. We recommend that the minimization of transmission of disease out of the facilities be incorporated into the proposed text. The new sub-bullet number 3 should read: minimizing the opportunities for disease transmission while the animals are in the facilities and for preventing the transmission of disease out of the facility. The managers should be responsible for both minimizing the opportunities for disease transmission while the animals are in the facility and for preventing disease transmission out of the facility.

Article 1 (continued)

Responsibilities

Bullet 5, sub-bullet 8: the proposed text reads, ensuring proper rest times and delay during lairage. The text is vague and ambiguous. It does not specify what proper rest times are. Further clarification and specificity for what constitutes proper rest times would help ensure consistent understanding and implementation of the principle.

Bullet 7 reads: Private veterinarians and para-professionals involved in transporting animals and the associated handling procedures should receive specialist training. It is important that everyone involved in transporting animals be adequately trained to perform their job. Therefore, we recommend that the text should read: All individuals, including private veterinarians and para-professionals involved in transporting animals and the associated handling procedures should receive the appropriate training to perform their assigned duties.

Article 2

Training

Bullet 2 reads: Training courses should be provided by formal educational institutions such as veterinary facilities. We recommend that additional examples of formal educational institutions be included in the text. The proposed text should read: Training courses should be provided by formal educational institutions such as veterinary facilities, agricultural science facilities, and professional technical facilities

Article 3

Documentation

Bullet 2, sub-bullet 6 reads: details of animals at risk. The text is vague. We recommend that the text be clarified for the intended interpretation and consistent implementation of the principle.

Article 4

Planning the journey

General

Bullet 4 reads: There should be planning for water and feed availability during the journey. Feed should be of the appropriate quality and composition etc... We recommend the word potable is included in the text. The new text should read: There should be planning for potable water and feed availability during the journey. By specifically stating potable water should be made available provides the reader with direct instruction to ensure the animals receive safe drinking water.

Bullet 6, third sentence reads: In some extreme conditions of heat or cold, animals should not be transported at all. We recommend changing the text to include reference to relative humidity as a factor to consider with extreme weather conditions. Relative humidity can have a direct effect on the impact of extreme hot and cold conditions on animals in transit. Therefore, the relative humidity should also be considered when animals may be transported. The new sentence should read: In some extreme conditions of heat, cold or relative humidity, animals should not be transported at all.

Ability to inspect animals en route in relation to journey duration

Bullet 2 reads: To allow an adequate inspection of animals en route, it should be possible for each animal to be clearly observed by the driver or other responsible person. As proposed this principle will be hard to perform, especially with poultry. As a suggestion, perhaps, heat or CO2 sensors may be placed in the load to assist with the assessment/inspection of the animals in transit.

Space allowance

Bullet 5 reads: Animals should have sufficient space to adopt a braced standing position without contacting other animals. This space requirement is appropriate for most species. However, we suggest that poultry may benefit in transit by contacting other animals while in transit. Poultry should have contact with each other for support but not be packed so close together that they can not move, turn around, or lie down without having to step on each other.

Article 5

Pre-journey period

General

Bullet 2 reads: The provision of feed and water pre-journey is necessary if the journey duration is greater than the normal inter-feeding and inter-drinking interval for the animal. This principle may not be applicable to poultry being transported to slaughter. For example, broiler chickens feed and drink frequently, however to prevent carcass contamination, feed and water are generally withdrawn at time sufficiently in advance of transport to ensure that the birds do not consume food or water for 8 – 12 hours prior to processing. This time consideration exceeds their normal inter-feeding and inter-drinking interval.

Bullet 3 reads: For animals such as pigs which are susceptible to motion sickness, and in order to reduce urine and faeces production during the journey, a short period of feed deprivation prior to loading is desirable. The phrase “short period” is vague and ambiguous. We suggest that clarification of the term short period be included in the text for an accurate interpretation by the reader.

Bullet 5 reads: All vehicles and containers for animals should be thoroughly cleaned and, if necessary disinfected before animals are loaded. To prevent or minimize the possibility of transmission of disease between shipments of animals the vehicles should always be cleaned and disinfected before animals are loaded. Therefore, we suggest the text should read: All vehicles and containers for animals should be thoroughly cleaned and disinfected before animals are loaded.

Bullet 6 reads: Before a journey, animals should be inspected, where possible by a veterinarian. We suggest that the text read: Before a journey, animals should be inspected, where possible by a veterinarian or other qualified person. Other individuals who possess the knowledge, skills, and expertise to evaluate the animals health and condition may be authorized to inspect the animals.

Selection of compatible groups

Bullet 1, sub-bullet 1 reads: animals of different species should not be mixed unless they have been reared together for a long period. We suggest that the phrase reared together for a long period is vague and ambiguous. It would be helpful to the reader if clarification of what the intent of reared together for a long period of time actually implies.

Article 5 (continued)

Pre-journey period

Fitness to travel

Bullet 5, sub-bullet reads: very young or very old animals. The wording very young or very old is vague. We suggest the text should be more specific to insure that it is interpreted accurately by the reader.

Article 6

Loading

The title of this section, Loading, is somewhat vague when applied to chickens and ducks. These animals are caught and then crated. To ensure that this section applies to poultry we recommend that the title be changed to Catching and Loading.

Facilities

Bullet 1 reads: The facilities for loading including the collecting area, races and loading ramps should be designed and constructed to take into account of the needs of the animals etc... We recommend deleting the word “of” from the text. The new text should read: The facilities for loading including the collecting area races and loading ramps should be designed and constructed to take into account the needs of the animals etc...

Bullet 2, first sentence reads: All loading facilities should be properly illuminated to allow the animals to be easily inspected by the handler etc... We recommend that the wording of this principle be changed to include poultry that are caught rather than loaded. Poultry are caught in dim lighting to minimize movement and fear reactions of the birds. Light that is bright enough to allow easy inspection would have negative effects on the welfare of poultry.

Article 7

Travel

Regulating microclimate, including during journey stops

Bullet 1, second sentence reads: Procedures for maintaining microclimate in vehicles... We recommend adding the word “the” to the text. The new text should read: Procedures for maintaining the microclimate in vehicles...

Article 8

Unloading and post-journey handling

Facilities

Bullet 1 reads: Unloading can be associated with traumatic experiences for animals; so procedures should be planned and facilities carefully designed to facilitate unloading without poor welfare. The phrase poor welfare is ambiguous and vague. We recommend deleting the phrase “poor welfare” and replacing it with “using inhumane treatment or handling”. The new text should read: Unloading can be associated with traumatic experiences for animals; so procedures should be planned and facilities carefully designed to facilitate unloading without using inhumane treatment or handling.

Bullet 2 reads: Animals should be given adequate opportunity to familiarize themselves before attempts are made to move them. The statement is incomplete. It is not obvious with what the animals need to become familiar before they are moved. We recommend the text specifically state what the animals need to be familiar with before they are moved.

Ventilation

Bullet 1, last sentence reads: Closed sheds should be well ventilated to prevent the build-up of heat. We recommend replacing “closed sheds” with “holding areas”. The new text should read: Holding areas should be well ventilated to prevent the build-up of heat. The change should be made because poultry are often kept in lairage on the transport truck, or may be unloaded and the crates stacked in a lairage area. Regardless of the level of enclosure of the lairage area, it is very important to provide adequate ventilation to prevent heat stress in poultry when they are sitting in stacked crates.

Feed and water

Bullet one reads: All animals should be offered water and feed as soon as possible after the end of the journey. If these principles are intended to include the transportation of animals to immediate slaughter, the provision of food and water is contraindicated at the end of the journey. We recommend that the text should be changed to read: All animals should be offered water and feed as soon as possible after the end of the journey, except for animals going immediately to slaughter.